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BY ECF

Hon. James Orenstein
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *In re Payment Card Interchange Fee and Merchant
Discount Fee Antitrust Litigation*, 05-MD-01720 (JG)(JO)

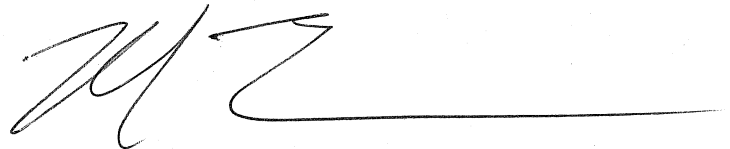
Dear Judge Orenstein:

As Your Honor requested at the last Status Conference, enclosed please find a proposed Order designed to address issues relating to (1) documents that were produced by parties and third parties as "Confidential" or "Highly Confidential" under the protective order in MDL 1720, and (2) documents for which parties or third parties received notice that may have been required by contracts before they were produced by parties in MDL 1720.

The opt-out defendants have shared this proposed Order with the other parties in the opt-out and declaratory judgment actions, and understand that they consent to its entry.

Thank you for your consideration.

Respectfully submitted,



Matthew A. Eisenstein
Counsel for the Visa Defendants

cc: All counsel of record (via ECF)